

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE	*	CASE NO. 19-02213/MCF
	*	
ALEXANDER COTTO DELGADO	*	
GRISELLE CRUZ CRUZ	*	CHAPTER 13
	*	
<u>DEBTOR</u>	*	

**DEBTOR'S REPLY TO TRUSTEE'S *MOTION TO DISMISS* DOCKET NO. 42
AND IN COMPLIANCE WITH ORDER, DOCKET NO. 45.**

TO THE HONORABLE COURT:

NOW COME, ALEXANDER COTTO DELGADO and GRISELLE CRUZ CRUZ, the Debtors, through the undersigned attorney, and very respectfully state and pray as follows:

1. The Chapter 13 Trustee filed a *Trustee's Motion to Dismiss*, Docket No. 42, whereby the Trustee requests the Court to dismiss the present Chapter 13 case based on Plan arrears incurred by the Debtors, in the sum of \$600.00, in the above captioned case.

2. On August 24, 2022, this Honorable Court issued an *ORDER*, Docket No. 45, whereby the Debtors are Ordered to reply within 30 days to the *Trustee's Motion to Dismiss* (Docket No. 42), which Order is due by September 23, 2022.

3. The Debtors hereby respectfully submit that on August 19, 2022, they made one (1) \$300.00 payment to the Trustee, registered with the Trustee on August 22, 2022 additionally, on September 16, 2022, the Debtors made one (1) \$300.00 payment to the Trustee money order no. 22-013793479, for a total payment of \$600.00, to cure all arrears in the confirmed Plan.

4. The Debtors respectfully submit that they are up-to-date in the confirmed Plan payments, thus, respectfully request the Court to deny the *Trustee's Motion to Dismiss*,

Docket no. 42, in the above captioned case.

WHEREFORE, the Debtors, through the undersigned attorney respectfully request that this Honorable Court grant the foregoing Reply to the *Trustee's Motion to Dismiss*, Docket No. 42, and in compliance with *Order* dated August 24, 2022, Docket No. 45 and respectfully request the Court to deny the *Trustee's Motion to Dismiss*, Docket no. 42, in the above captioned case.

I HEREBY CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using the CM/ECF filing system which will send notifications of such to the Chapter 13 Trustee and to all CM/ECF participants; I also certify that I have mailed by United States Postal Services copy of this motion to the following non-participant: the Debtors, Alexander Cotto Delgado and Griselle Cruz Cruz, Jardines de Condado Moderno Apt C 5 B Caguas PR 00725, in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 20th day of September, 2022.

/s/ Roberto Figueroa Carrasquillo
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
USDC #203614
ATTORNEY FOR THE DEBTORS
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699/787-963-7699
Email: rfc@rfigueroalaw.com

FINANCIAL SUMMARY - CASE 19-02213ALEXANDER COTTO DELGADO paying **\$100.00** MONTHLY

Receipts	Rcpts/Deb Refunds	Disbursements	Adjustments	Trustee Disb	Trustee Adj	Show All
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 Limits: Select Start Date ▼ Select Claim ID ▼ Select Payee Name ▼ Check Status: **Cleared** Stale Dated Stop Payment Cancelled Voided Outstanding

Date	Payee	Payee Name	Source / Check	Description	Receipts	Disbursements	Balance
8/22/2022			Deb 08-22 2022	OFFICE DIRECT DEPOSIT	\$300.00		
3/21/2022			Deb 03-21 2022	OFFICE DIRECT DEPOSIT	\$200.00		
1/31/2022			Deb 01-31 2022	OFFICE DIRECT DEPOSIT	\$400.00		
9/24/2021			0714 86700 0003	LOCKBOX PAYMENT	\$200.00		
8/18/2021			Deb 08-18 2021	OFFICE DIRECT DEPOSIT	\$300.00		
4/29/2021			7626 48W00 0003	INTERNET PAYMENT	\$100.00		
4/29/2021			7626 98W00 0003	INTERNET PAYMENT	\$100.00		
4/20/2021			6429 16W00 0003	INTERNET PAYMENT	\$100.00		
3/23/2021			3698 06S00 0003	INTERNET PAYMENT RETURNED	(\$100.00)		
3/22/2021			3698 06S00 0003	INTERNET PAYMENT	\$100.00		
1/22/2021			6841 79W00 0003	INTERNET PAYMENT	\$100.00		
1/22/2021			6841 18W00 0003	INTERNET PAYMENT	\$100.00		
12/24/2020			3953 75S00 0003	INTERNET PAYMENT RETURNED	(\$100.00)		
12/23/2020			3953 75S00 0003	INTERNET PAYMENT	\$100.00		
11/24/2020			1147 47W00 0003	INTERNET PAYMENT	\$100.00		
10/26/2020			7214 30W00 0003	INTERNET PAYMENT	\$100.00		
8/26/2020			1251 44W00 0003	INTERNET PAYMENT	\$100.00		
7/27/2020			6826 63W00 0003	INTERNET PAYMENT	\$100.00		
6/29/2020			3765 95W00 0003	INTERNET PAYMENT	\$100.00		
6/25/2020			3359 71W00 0003	INTERNET PAYMENT	\$100.00		
5/26/2020			9422 97W00 0003	INTERNET PAYMENT	\$100.00		
5/8/2020			7765 57W00 0003	INTERNET PAYMENT	\$100.00		
5/1/2020			6878 77S00 0003	INTERNET PAYMENT RETURNED	(\$100.00)		
4/30/2020			6878 77S00 0003	INTERNET PAYMENT	\$100.00		
4/21/2020			5856 98S00 0003	INTERNET PAYMENT RETURNED	(\$100.00)		
4/20/2020			5856 98S00 0003	INTERNET PAYMENT	\$100.00		
2/28/2020			0714 86301 0003	LOCKBOX PAYMENT	\$100.00		
1/29/2020			0714 86700 0003	LOCKBOX PAYMENT	\$100.00		
12/31/2019			0714 86706 0003	LOCKBOX PAYMENT	\$100.00		
12/3/2019			Deb 12-02 2019	OFFICE DIRECT DEPOSIT	\$100.00		
10/29/2019			Deb 10-29 2019	OFFICE DIRECT DEPOSIT	\$100.00		
9/30/2019			Deb 09-30 2019	OFFICE DIRECT DEPOSIT	\$100.00		
9/4/2019			Deb 09-03 2019	OFFICE DIRECT DEPOSIT	\$100.00		
7/26/2019			Deb 07-26 2019	OFFICE DIRECT DEPOSIT	\$100.00		
6/24/2019			0714 86701 0003	LOCKBOX PAYMENT	\$100.00		
5/23/2019			0714 86701 0003	LOCKBOX PAYMENT	\$100.00		
Totals:					\$3,700.00	\$0.00	

THIS DOCUMENT CONTAINS A TRUE WATERMARK - HOLD UP TO LIGHT TO VIEW

WesternUnion WU

WESTERN UNION FINANCIAL SERVICES INC. - ISSUER - Denver, Colorado
Payable at Wells Fargo Bank Grand Junction - Downtown, N.A., Grand Junction, Colorado

22-013793479

Walmart

A 134872 D 091622
T 0915 2840
220137934792 L 002449

\$ 300.00

PAY EXACTLY THREE HUNDRED DOLLARS AND NO CENTS

PAY TO THE ORDER OF Alexandro Olivera Rivera Alexander 10/40
Chapter 13 Trustee delgado
Alex 10/40 delgado

19-02213-MCF

⑆102100400⑆ 40220137934792⑈